

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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VAUGHN SCOTT, NIGERIA SCOTT, PRINCE SCOTT,  
ANDREE HARRIS, BRENDA SCOTT, KRAIG UTLEY,  
COREY MARROW, AS A MINOR CHILD, K.M., A  
MINOR CHILD, and JULIAN RENE,

Plaintiffs,                      Index No. 14-CV-4441 (SHS)

-against-

THE CITY OF MOUNT VERNON, et al.,

Defendants.

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DEPOSITION OF JOHN GAMBLE

Mount Vernon, New York

November 20, 2015

2:00 p.m.

Reported By:  
Cheryll Kerr, RPR, SHR  
Job No. 41847

John Gamble

November 20, 2015

2:00 p.m.

Deposition of John Gamble, held at City  
Hall, One Roosevelt Square, Mount Vernon, New  
York, pursuant to Notice before Cheryll Kerr,  
RPR, SHR, and Notary Public in and for the State  
of New York.

1 captain. It all depends who was working that  
2 particular day.

3 Q Okay. All right.

4 In your duties as a detective on and about  
5 March 20th, 2013, did you normally perform your  
6 duties within Two Roosevelt Square, or somewhere  
7 else?

8 A It depends on where the incident occurs.

9 It could be throughout the City of Mount  
10 Vernon. It could be Westchester, the Bronx, New  
11 York City, elsewhere.

12 Q Okay.

13 Did there come a point in time on March 20,  
14 2013 when you left Two Roosevelt Square to going  
15 somewhere else?

16 (Pause)

17 THE WITNESS: Honestly, I don't  
18 recall.

19 BY MR. THOMPSON:

20 Q Okay. This particular lawsuit relates to  
21 an incident occurred, in part, at 328 South Second  
22 Avenue.

23 Do you recall whether you were ever at 328  
24 South Second Avenue on March 20th, 2013?

25 A I do not recall.

1 Q Okay.

2 Do you recall being in a private apartment on  
3 that date as part of an investigation, or for any  
4 other reason?

5 A No.

6 (Pause)

7 BY MR. THOMPSON:

8 Q Okay.

9 Is there anything that would refresh your  
10 recollection as to your activities on March 20,  
11 2013?

12 A If there's a report out there, that may  
13 have me listed or something like that, but nothing  
14 for me, no.

15 Q Okay, so just to be clear -- you know,  
16 and I'm -- it's perfectly fine not to recall things,  
17 if that's the truth of what is in your mind.

18 Do you recall any specific activities that you  
19 performed as part of your duties on March 20, 2013?

20 A No.

21 Q Okay.

22 (Pause)

23 MR. THOMPSON: Could I actually have  
24 a moment with you, Counsel?

25 MR. WISHAM: Absolutely.

1 (Recess taken at 2:16 p.m.)

2 (Resumed at 2:17 p.m.)

3 BY MR. THOMPSON:

4 Q All right.

5 Do you recall having any encounter with a  
6 person named Prince Scott on or about March 20th of  
7 2013?

8 A No.

9 Q Okay.

10 Do you recall having any encounter with a  
11 person named Corey Marrow on or about March 20th,  
12 2013?

13 A No.

14 Q Do you recall having any kind of an  
15 encounter with a person named Kraig Utley on or  
16 about March 20th, 2013?

17 A No.

18 Q Do you recall having any encounter with a  
19 person named Julian Rene on or about March 20th,  
20 2013?

21 A No.

22 Q Do you recall having any encounter with a  
23 person named Vaughn Scott -- a female named Vaughn  
24 Scott -- on or about March 20th, 2013?

25 A No.

1 Q Okay.

2 Do you recall having any encounter with a  
3 person named Nigeria Scott on or about March 20th,  
4 2013?

5 A No.

6 Q Do you recall having an encounter with a  
7 person named Brenda Scott on or about March 20th,  
8 2013?

9 A No.

10 Q All right. I am going to show you some  
11 documents.

12 I am going to ask you if they refresh your  
13 recollection as to any events that occurred on  
14 March 20th, 2013. Now, obviously, if there's no  
15 recollection to refresh, the answer is -- an  
16 appropriate answer is no.

17 Counsel can jump in, but the question is not  
18 whether you can see what's on the document and read  
19 it to me.

20 The question is whether reviewing the document  
21 provokes an independent recollection that you may  
22 have about anything that occurred on March 20th,  
23 2013 --

24 A Okay.

25 Q -- okay? I am going to start you off

1 THE WITNESS: Okay.

2 (Pause)

3 BY MR. THOMPSON:

4 Q Have you had a chance to review the  
5 document?

6 A Yes.

7 Q Did you read the narrative?

8 A Yes.

9 Q All right.

10 Did anything in this document refresh your  
11 recollection as to whether or not you were involved  
12 in this incident in any way?

13 A No.

14 Q Okay.

15 Do you recall being involved in this incident  
16 at all?

17 A No.

18 Q Can you say that you were not involved in  
19 this incident?

20 (Pause)

21 THE WITNESS: All I could say is I  
22 was working, but I don't recall this  
23 incident.

24 BY MR. THOMPSON:

25 Q Okay. All right.

MR. THOMPSON: I think I don't need

to go through the rest of these exhibits,  
based on our conversation and what the

witness has testified to so far, that --  
you know, he probably wasn't involved in  
this --

THE WITNESS: No.

MR. THOMPSON: -- so we will close

this deposition and take it from there.  
Do you have any questions?

MR. WISHAM: No questions. Thank

you.

THE WITNESS: Thank you.

(Thereupon, the deposition was

concluded at 2:23 p.m.)

(Pause)